

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
EASTERN DIVISION**

United States of America,

Plaintiffs,

vs.

Jesus Amurahaby Celestin-Ortega,

Defendant.

**DEFENDANT'S MOTION TO CONTINUE  
JURY TRIAL**

Case No.: 3:24-cr-00061

The Defendant, Jesus Amurahaby Celestin-Ortega, by and through the undersigned attorney, Nicole L. Bredahl, Barkus Law Firm, P.C., moves this Court for an Order to Continue the Jury Trial scheduled to commence on September 10, 2024, at 9:30am.

Undersigned counsel was appointed for representation of the Defendant on April 26, 2024. Undersigned counsel is still working through the voluminous amounts of discovery that needs to be reviewed by both undersigned counsel and Defendant. Further, undersigned counsel will file a request for a Complex Case Designation. Unsigned counsel and Defendant need adequate time to do investigation into the discovery and conduct plea negotiations with the Government.

Undersigned counsel has spoken with AUSA, Christopher Myers, and the Government has no objection to this continuance request.

Undersigned counsel has spoken with Defendant, Jesus Amurahaby Celestin-Ortega, and he does not object to this continuance request.

Undersigned counsel represents that this request is not made for undue delay or any

other improper reason. A Waiver of Speedy Trial is forthcoming and will be filed once it has been signed and received.

WHEREFORE, Defendant, Jesus Amurahaby Celestin-Ortega, respectfully requests to continue the Jury Trial scheduled for September 10, 2024, to allow for discovery review, investigation, and negotiations.

Dated this 7th day of August, 2024.

BARKUS LAW FIRM, P.C.

A handwritten signature in black ink, reading "Nicole Bredahl", is positioned above a horizontal line.

Nicole L. Bredahl, ND ID #08467

3431 4<sup>th</sup> Avenue South, Suite 201

Fargo, North Dakota 58103

Tele: 701-532-2498

Eservice: [eservice@barkuslawfirm.com](mailto:eservice@barkuslawfirm.com)

Email: [nicole@barkuslawfirm.com](mailto:nicole@barkuslawfirm.com)

ATTORNEYS FOR DEFENDANT